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**BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.**

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U.S.-CHINA AIR SERVICES  
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Docket OST-99-5539 -2

**APPLICATION OF UNITED AIR LINES, INC.**

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**DATED: April 21, 1999**

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**BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.**

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U. S.-CHINA AIR SERVICES  
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Docket OST-99-5539

**DATED: April 21, 1999**

**APPLICATION OF UNITED AIR LINES, INC.**

United Air Lines, Inc. requests that United be allocated seven weekly U.S.-China frequencies for daily nonstop combination service between San Francisco, California, and Shanghai, China, effective April 1, 2000. In support of its request, United submits the following:

**1. INTRODUCTION AND SUMMARY.**

United proposes to operate nonstop services on a daily basis between its West Coast hub at San Francisco and Shanghai. United will start these services April 1, 2000, when nine additional weekly frequencies become available. The services will be operated with state-of-the-art B747-400 aircraft configured with amenities specially designed to accommodate passengers over a long-haul flight such as the 6,168-mile segment between San Francisco and Shanghai. This will be the only daily nonstop roundtrip service between the U.S. and China.

United's nonstop services will benefit passengers throughout its system by creating one-stop connections to China over its San Francisco hub. San Francisco is also ideally located as a gateway for passengers throughout California, which is the largest U.S. market for services to China. United's nonstop flight will originate at its Washington Dulles East Coast hub, offering convenient single-flight-number service in the Washington-Shanghai market.

United's **B747-400** aircraft will also offer important benefits to cargo shippers in the U.S.-China market. This aircraft will have up to 32,000 pounds of cargo capacity per flight available for freight and mail between San Francisco and Shanghai. United's services will allow shippers to expand their use of San Francisco as a consolidation point for their China shipments.

Because of the importance of daily service patterns to business travelers, United requires seven frequencies for its new San Francisco-Shanghai nonstop services. By upgrading its San Francisco-Shanghai service to nonstop, United will also be able to modify one of its existing daily one-stop service patterns. This would enable United to serve a new gateway in China.

United needs all seven of the frequencies it seeks effective April 1, 2000, in order to assure its ability to implement a daily nonstop service pattern. United, unlike Northwest and other U.S. carriers serving China, is effectively precluded from code sharing on services to China. United urged the U.S. at the recent U.S.-China negotiations to obtain third-country code-share rights to enable the United/ANA alliance to compete with the alliances formed by other U.S. carriers and their Chinese partners. The U.S. was unable to obtain third-country code-share rights, however, even though it agreed to enhance the code-share authority of United's competitors. Because United is precluded from serving China in conjunction with its code-share partner, ANA, United must rely on services operated in its own aircraft to expand its U.S.-China services. United's request for seven frequencies, therefore, deserves priority consideration over Northwest, which has expansive online access to China through the services of its Chinese code-share partner, Air China.

**2. UNITED'S DAILY SAN FRANCISCO-SHANGHAI NONSTOP FLIGHTS  
OFFER AN IMPORTANT UPGRADE IN U.S.-CHINA SERVICE.**

United seeks seven of the 17 weekly U.S.-China frequencies available in this proceeding in order to operate a daily combination service originating at Washington Dulles and operating nonstop between San Francisco and Shanghai starting April 1, 2000. United will operate these services on a year-round basis, using B747-400 aircraft configured with 368 seats for the San Francisco-Shanghai nonstop portion. A schedule for these services is attached as *Exhibit UA-I*. These services will improve United's elapsed times between San Francisco and Shanghai by an average of over 2% hours.'

United currently operates 14 weekly U.S.-China one-stop services. This includes a daily service between San Francisco and Beijing via Tokyo, with continuing service to New York/Newark (EWR) (UA 852/853), and a daily service between San Francisco and Shanghai via Tokyo, with continuing service to Boston (UA 837/838).<sup>2</sup> The New York/Newark-San Francisco-Tokyo-Beijing and Boston-San Francisco-Tokyo-Shanghai services are operated with B747 equipment between San Francisco and China, and with B757 equipment on the domestic legs. A schedule for these existing one-stop services is attached as *Exhibit UA-2*. After implementing the daily nonstop San Francisco-Shanghai services proposed in this proceeding,

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<sup>1</sup> See *Exhibit UA-7*.

<sup>2</sup> Flight UA 838 operates as through-plane service from Shanghai to San Francisco, with a stop at Tokyo. The other one-stop flights have a change of aircraft at Tokyo.

United would be able to **modify** its present U.S.-Tokyo-Shanghai one-stop flight to serve a new Chinese point in addition to Shanghai and **Beijing**.<sup>3</sup>

All of United's current Tokyo-Shanghai and Tokyo-Beijing flights carry local, fifth-freedom traffic, as would a modified one-stop service via Tokyo discussed above. United, unlike Northwest and the other U.S. carriers serving China, does not display the designator code of a Chinese-flag carrier on any of its U.S.-China flights. As set forth more fully below, this seriously disadvantages United's ability to compete with other carrier networks and requires United to rely upon its own aircraft to develop new services to China. All of United's current and proposed U.S.-China services are operated on a year-round basis.

**3. UNITED HAS SELECTED SAN FRANCISCO AND SHANGHAI AS ITS NONSTOP U.S.-CHINA GATEWAYS BECAUSE OF THE SERVICE BENEFITS THEY OFFER.**

United's proposed San Francisco-Shanghai service will be the first nonstop roundtrip service operated on a daily basis by any carrier between the U.S. and China. See Exhibit UA-3. United operates 253 daily departures serving 49 cities from its hub at San Francisco. When United Express services are included, there are a total of 338 daily departures at San Francisco serving 61 cities. See Exhibit UA-4.

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<sup>3</sup> Because these new one-stop services would not be implemented until after the San Francisco-Shanghai nonstop services have begun, United is not, at this time, seeking any amendments in its U.S.-China certificate authority which already includes the right to serve Beijing, Shanghai and Guangzhou. See Order 98-4-3 (Certificate of Public Convenience and Necessity for Route 246). United can operate its proposed San Francisco-Shanghai daily nonstop services under its existing U.S.-China authority.

California is by far the largest U.S. market for service to China, and San Francisco is the second largest U.S. market to Shanghai. See Exhibit UA-5. California traffic to China exceeds the next largest U.S. market (New York) by 150 percent. The San Francisco Bay Area is home to the largest Chinese population in the U.S. Despite these facts, there is today no daily nonstop roundtrip service between California and China. United's new service will fill this substantial service void, especially for the business traveler for whom daily nonstop service is essential. United's service will convenience both San Francisco and Los Angeles, the two largest metropolitan U.S. markets to Shanghai. The Los Angeles-San Francisco market is served by Shuttle by United, which has 38 daily roundtrip services in this city pair. At least seven of those services in each direction are scheduled at times that would offer convenient connections to the new San Francisco-Shanghai nonstop service.

United has selected Shanghai as its nonstop gateway in China. Shanghai is the sixth largest urban area in the world, and has the largest population of any Chinese city, 15 million. Shanghai is widely acknowledged to be China's "largest industrial and commercial center."<sup>4</sup> Its exports have increased more than 5 times over the levels of 20 years ago.<sup>5</sup> A highly respected international business publication described Shanghai as follows:

The combination of concentrated industrial and consumer demand,  
China's broadest and most sophisticated industrial base and a

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<sup>4</sup> "Shanghai's Foreign Trade Booming," CHINA DAILY, December 1, 1998.

<sup>5</sup> Id.



densely populated Yangtze delta hinterland have [made] Shanghai and its environs . . . the hottest investment prospect in the country.<sup>6</sup>

Shanghai is also well located as a gateway to other points in China and has frequent air service to cities throughout China and the rest of Asia. See Exhibit UA-6. Shanghai is, therefore, an excellent gateway for both business and discretionary travelers.

Passengers at United's East Coast Washington Dulles hub will also benefit directly from the new nonstop services. United will schedule single-flight-number service between Washington Dulles and Shanghai, with a single stop and change of aircraft at San Francisco. Washington is one of the top ten markets to China. Washington passengers will save 2% hours over United's existing online connecting services and will enjoy the added benefit of **single-flight-number** schedules. See Exhibit UA-7.

**4. UNITED'S SAN FRANCISCO HUB WILL ENABLE IT TO OFFER  
ONLINE SERVICE IMPROVEMENTS TO POINTS THROUGHOUT ITS  
SYSTEM.**

United's nonstop service from its San Francisco hub will offer important service improvements to the large number of U. S.-China passengers living in California and the Washington Metropolitan area. Also, passengers to China from many of the interior points served from San Francisco must now either make two stops or travel on a foreign carrier offering **less-than-daily** service between the U. S. and China. As a result of United's service upgrade, these passengers will now enjoy convenient nonstop-to-nonstop daily roundtrip connections. There will be significant time savings for United's passengers in these important interior markets. This is

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<sup>6</sup> The Economist Intelligence Unit, *OPERATING IN CHINA* (March 1998), p. 44.

illustrated in *Exhibit UA-7*, showing improvements of more than two hours for United's online connecting services in large China markets such as Boston, Newark, Houston, Dallas/Fort Worth, and Atlanta. Moreover, United will now offer its connecting passengers to Shanghai a connection at its U. S.-based San Francisco hub rather than a less convenient foreign point (Tokyo).

**5. UNITED'S NONSTOP SERVICES WILL BE FLOWN IN B747-400 AIRCRAFT WITH INDUSTRY-LEADING ONBOARD FEATURES.**

United will use state-of-the-art B-747-400 equipment to operate its new San Francisco-Shanghai nonstop service. These aircraft will be configured with **14** first class, 84 business and 270 economy seats. See *Exhibit UA-8*. These aircraft will also offer the United First Suite ("Suite") configuration. This new and innovative service will make United the first U.S. airline to provide a lie-flat bed and integrated work station on its fleet of international aircraft. The Suite is the ideal service for business travelers. It creates a total **office** environment with an individual and private work station that is large enough to accommodate a laptop computer, an **inseat** phone that will allow data transmission, and **onboard** laptop power. When in bed mode, the Suite provides customers with a private sleeping area with a comfortable mattress.

All business class seats will also have laptop connections. These aircraft will also be equipped with United's enhanced entertainment system in all classes of service. This system offers individual monitors with a wide choice of programming at every seat, which is particularly valuable to passengers on long-haul inter-continental services.

**6. UNITED'S NEW SAN FRANCISCO-SHANGHAI SERVICE WILL OFFER IMPORTANT NEW CARGO SERVICE BENEFITS.**

The selection of the B747-400 aircraft will also offer important cargo benefits. It allows United to offer up to 32,000 pounds of capacity per flight for freight and mail between San Francisco and Shanghai. This will enable United to more than double the amount of freight and mail it can carry between San Francisco and Shanghai as compared current service.

Shanghai is an excellent market for United in terms of cargo traffic to mainland China. It is a stronger cargo market than other major Chinese cities, such as Beijing. San Francisco is a United hub and, therefore, affords United an excellent opportunity to feed freight and mail to and from points throughout the U.S. and the Western Hemisphere.

There is a strong demand for electronics, fish and consumer goods originating in China, and a strong demand in China for U.S. products. United's ability to meet these demands is currently limited by its capacity out of Tokyo, some of which is used for fifth-freedom traffic. The new non-stop service will make the entire non-baggage cargo capacity of the aircraft available for shipments to or from the U.S.

**7. UNITED NEEDS ITS FULL REQUEST OF SEVEN FREQUENCIES SO THAT IT CAN OFFER THE DAILY NONSTOP SERVICE PATTERN THAT THE MARKET REQUIRES.**

To operate its proposed daily nonstop services, United requires seven of the 27 new U.S.-China frequencies available under the recent amendments to the U.S.-China bilateral air services agreement. United can accept frequencies from among those to be available on April 1, 2000, and will accommodate its service plans to the bilaterally-agreed frequency phase-in

schedule. Because United proposes to use its seven new frequencies solely to operate nonstop services, it is willing to accept an allocation of combination service frequencies from the pool of frequencies that are restricted by agreement to nonstop U. S.-China service.

Based on United's experience, a daily schedule is essential to the success of U. S.-China nonstop services, particularly to Shanghai. U.S.-China is a business-oriented market and Shanghai is pre-eminently a business destination. Given business travelers' strong preference for daily service, daily San Francisco-Shanghai service is a **must**.<sup>7</sup>

United has consistently recognized the importance of daily service in planning its international services in other areas of the world. United operates to 34 destinations outside the U.S., all of which are served on a daily basis. United recognized the need for daily service to China when it increased its one-stop service patterns to Shanghai and Beijing from four weekly to each city to daily to each city in February 1994.

United previously experimented with nonstop services between San Francisco and Shanghai in 1991-92. At that time, however, the market had not sufficiently recovered from the events of 1989 to support daily nonstop service. Moreover, the only aircraft available at that time with the capacity and range suitable for such nonstop service was the notoriously inefficient **B747SP**. These services ultimately proved to be unsuccessful, and United elected to offer daily

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<sup>7</sup> According to a leading econometric analysis, business travelers are over four times more sensitive to greater frequency offerings than pleasure travelers. See Morrison, Steven and Winston, Clifford, "An Econometric Analysis of the Demand for Intercity Passenger Transportation," **RESEARCH IN TRANSPORTATION ECONOMICS**, Vol. 2 (1985) pp. 213-37.

one-stop service via Japan to both Shanghai and Beijing. Those daily services were implemented in 1994 and have been operated continuously since.

**8. A DAILY NONSTOP SERVICE PATTERN IS ESSENTIAL FOR UNITED TO REMAIN COMPETITIVE WITH THOSE CARRIERS OPERATING UNDER CODE-SHARE ALLIANCES.**

United requires the full seven-frequency allocation it has requested because, unlike Northwest, the only other U.S. carrier designated for combination service, United lacks a Chinese code-share partner. United, therefore, lacks the ability to engage in network competition with other alliances by supplementing its U.S.-China nonstop schedules with nonstop flights operated by a Chinese partner. Northwest has a considerable scheduling advantage over United as a result of its code-share alliance with Air China. Northwest is currently able to offer 17 weekly frequencies to China in conjunction with its partner, Air China. See Exhibit UA-9.

The restrictive terms of the U.S.-China agreement preclude United from supplementing its U.S.-China service by code sharing with either a Chinese or third-country carrier. The U.S.-China agreement limits U.S. code-share partners to the three Chinese carriers presently designated for service to the U.S.: Air China, China Eastern and China Southern. Each of those carriers has chosen a U.S. partner. Indeed, two of those carriers (Air China and China Eastern) have formed code-share relationships which have been allowed by the Department to exclude the Chinese partner from code sharing with United.<sup>8</sup>

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<sup>8</sup> Inconsistent Departmental conditions preclude United from enforcing a similar exclusivity arrangement with All Nippon Airways ("ANA,'). United has urged that the conditions on exclusivity applicable to both the United/ANA and Northwest/Air China code shares be lifted. It (continued.. )

The U. S.-China agreement precludes U. S. carriers from code sharing to China with their third-country carrier partners. United's Japanese partner, ANA, serves nine Japan-China city pairs from gateways in Japan served by United. *Exhibit UA-10*. Despite the convenient connections these United/ANA services would afford, United is unable to code share on ANA's services due to restrictions in the U.S.-China bilateral agreement.

United sought an amendment to the U.S.-China agreement to allow third-country code sharing as its major goal in the recent round of negotiations. Because the U.S. has repeatedly recognized the importance of inter-alliance competition, United reasonably expected that at least some third-country code sharing would be allowed. Unfortunately, the U.S. was unable to gain approval of any third-country code-share term. Notwithstanding the lack of any agreement on third-country code sharing, the U.S. chose to allow the Chinese carriers and their U.S. partners to expand substantially their "bilateral" code-share alliances, which exclude United. This leaves United with no alternative but to compete with these networks by relying on service using its own equipment.

United should be given priority in the allocation of the frequencies needed to expand services using its own equipment. Under the present discriminatory bilateral agreement, such direct service expansions under which United uses its own equipment are the only avenue open to United for increasing its competitive presence in the U.S.-China market.

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<sup>8</sup> (. . . continued)  
is United's position that, absent special circumstances not present in the highly competitive U.S.-Japan market, such conditions are inappropriate.

**9. UNITED'S LONG-TERM COMMITMENT TO GROWTH IN THE U.S.-CHINA MARKET WARRANTS THE ALLOCATION OF ALL THE FREQUENCIES UNITED SEEKS.**

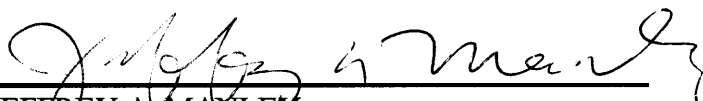
United has made a long-term commitment to the development of the U.S.-China market. United remained in the market after demand dropped precipitously following the Tiananmen Square events in 1989. United gradually rebuilt the market and, as noted above, introduced daily one-stop services to both Shanghai and Beijing in 1994. United took full advantage of the opportunities available under the frequency restrictions of the U.S.-China bilateral. United's daily services were introduced at considerable commercial risk in 1994, a risk the other U.S. carriers were unwilling to take at that time. As it turns out, United's risk paid off when its daily service patterns proved popular and the market responded favorably.

United has also expressed its commitment to growth in China in forms other than airline services. UAL Services (an operating division of United) has a permanent representative based in China and has been very active in providing technology and services to Chinese carriers and the Chinese government. UAL Services has sponsored numerous seminars and training on maintenance, engineering, revenue management, and scheduling. For example, a United manager was sent to China to teach a seminar on revenue management at the Civil Aviation University of China located outside of Beijing. United has also sponsored training for Chinese mechanics in conjunction with the City College of San Francisco. The first 20 graduates of this program are also the first Chinese mechanics to become U.S. FAA-certified mechanics.

**10. CONCLUSION.**

United has been seeking the necessary authority to increase its U. S.-China service for nearly five years. The recent amendments to the U.S.-China agreement offer United this opportunity. United remains precluded from expanding its service to China with its alliance partner, ANA. United is, however, fully prepared to operate its own equipment to expand its services to China as proposed herein. United needs seven nonstop frequencies in order to implement this service expansion and requests that it be allocated that number of frequencies effective April 1, 2000. United will use these frequencies to create important public benefits for passengers and shippers in California and throughout the country.

Respectfully submitted,

  
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Counsel for  
UNITED AIR LINES, INC.

**DATED: April 21, 1999**  
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# ***United Airlines Proposed U.S.-China Service***

## ***Washington-San Francisco-Shanghai***

**Daily Service Effective April 1, 2000**

**Read Down  
Flight UA-857**

**Read Up  
Flight UA-858**

7:30 a.m. Dep.	Washington (IAD)	Arr. 6:38 p.m.
10:04 a.m. Arr.	San Francisco	Dep. 10:40 a.m.
11:25 a.m. Dep.	San Francisco	Arr. 9:00 a.m.
3:25 p.m. Arr. (+1)	Shanghai	Dep. 12:35 p.m.

Equipment type: Airbus 320 from Dulles to San Francisco, B747-400 from San Francisco to Shanghai and Shanghai to San Francisco, and B757-200 from San Francisco to Dulles

## ***United Airlines Current U.S.-China Service***

### ***Boston-San Francisco-Tokyo-Shanghai***

#### **Daily Service**

##### **Read Down Flight UA-837**

8:05 a.m.	Dep.
11:28 a.m.	Arr.
2:05 p.m.	Dep.
4:50 p.m.	Arr.
6:05 p.m.	Dep.
8:15 p.m.	Arr.
(+1)	

Boston  
San Francisco  
San Francisco  
Tokyo  
Tokyo  
Shanghai

##### **Read Up Flight UA-838**

Arr.	9:57 p.m.
Dep.	1:30 p.m.
Arr.	10:35 p.m.
Dep.	5:25 p.m.
Arr.	2:10 p.m.
Dep.	10:20 a.m.

Equipment type: B757 from Boston to San Francisco, B747-200 from San Francisco to Tokyo, B747-200 from Tokyo to Shanghai, B747-200 from Shanghai to San Francisco, and B757 from San Francisco to Boston. Based on United's internal schedules as of April 1999. There is a change of aircraft at Tokyo in the Westbound direction (UA 837). Eastbound flights are through-plane service.

## ***United Airlines Current U.S.-China Service***

### ***New York/Newark-San Francisco-Tokyo-Beijing***

#### **Daily Service**

Read Down  
Flight UA-853

7:00 a.m.	Dep.
10:10 a.m.	Arr.
11:15 p.m.	Dep.
1:55 p.m.	Arr.
4:55 p.m.	Dep.
7:40 p.m.	Arr.
(+1)	

Newark  
San Francisco  
San Francisco  
Tokyo  
Tokyo  
Beijing

Read Up  
Flight UA-852

Arr.	7:21 p.m.
Dep.	11:00 a.m.
Arr.	9:25 a.m.
Dep.	4:25 p.m.
Arr.	2:55 p.m.
Dep.	10:20 a.m.

Equipment type: B757 for New York/Newark to San Francisco, B747-400 from San Francisco to Tokyo, B747-400 from Tokyo to Beijing, B747-400 from Beijing to Tokyo, B747-400 from Tokyo to San Francisco and B757 from San Francisco to New York/Newark. Based on United's internal schedules as of April 1999. There is a change of aircraft in both directions at Tokyo.

***No Carrier Currently Offers Daily Non-Stop Roundtrip Service  
In The U.S.-China Market***

<b><u>ORIGIN</u></b>	<b><u>DESTINATION</u></b>	<b><u>CARRIER</u></b>	<b><u>WEEKLY NONSTOP FREQUENCIES</u></b>
Detroit	Beijing	Northwest	5x
Los Angeles	Beijing	Air China	3x
		China Eastern	4x
Los Angeles	Guangzhou	China Southern	3x
Los Angeles	Shanghai	China Eastern	3x
San Francisco	Beijing	Air China	1x
		China Eastern	2x
San Francisco	Shanghai	Air China	3x

***United And United Express Operate  
A Total of 338 Departures from San Francisco***

<u>Destinations</u>	<u>Avg. Daily UA Depts.</u>
ANC	1.0
ATL	1.0
AUS	1.0
BDL	1.0
BOI	4.0
BOS	7.9
BUR	13.7
BWI	2.0
CDG	1.0
DEN	16.9
DFW	1.0
EUG	5.0
EWB	6.9
GEG	3.0
HKG	2.0
HNL	4.0
IAD	9.0
IAH	1.0
JFK	8.0
KIX	1.0
KOA	1.0
LAS	11.0
LAX	38.4
LHR	2.0
LIH	0.1
MCO	1.0
MEX	1.0
MFR	4.0
MIA	1.0
MRY	2.0
MSY	1.0
NRT	2.0
OGG	2.0
ONT	6.0
ORD	14.0
PDX	11.0
PHL	3.0
PHX	6.0
RNO	5.0
SAN	14.0
SBA	4.0
SEA	16.9
SLC	3.0
SNA	7.0
SYD	1.0
TPE	1.0
YVR	2.0
YYC	1.0
YYZ	1.0
	252.7

***United And United Express Operate  
A Total of 338 Departures from San Francisco***

<u>Destinations</u>	<u>Avg. Daily UAX Depts.</u>
ACV	9.9
BFL	4.9
CEC	1.0
CIC	5.9
FAT	16.0
MOD .	4.9
MRY	6.0
PSP	2.0
RDD	8.0
RDM	3.0
SBP	5.9
SMF	16.0
STS	<u>1.9</u>
	85.1

Total United Departures	252.7
Total UAX Departures	<u>85.1</u>
Total UA+UAX Departures	337.9
Daily Cities on United	49
Daily Cities on UAX	13
Daily Cities on UA/UAX	61

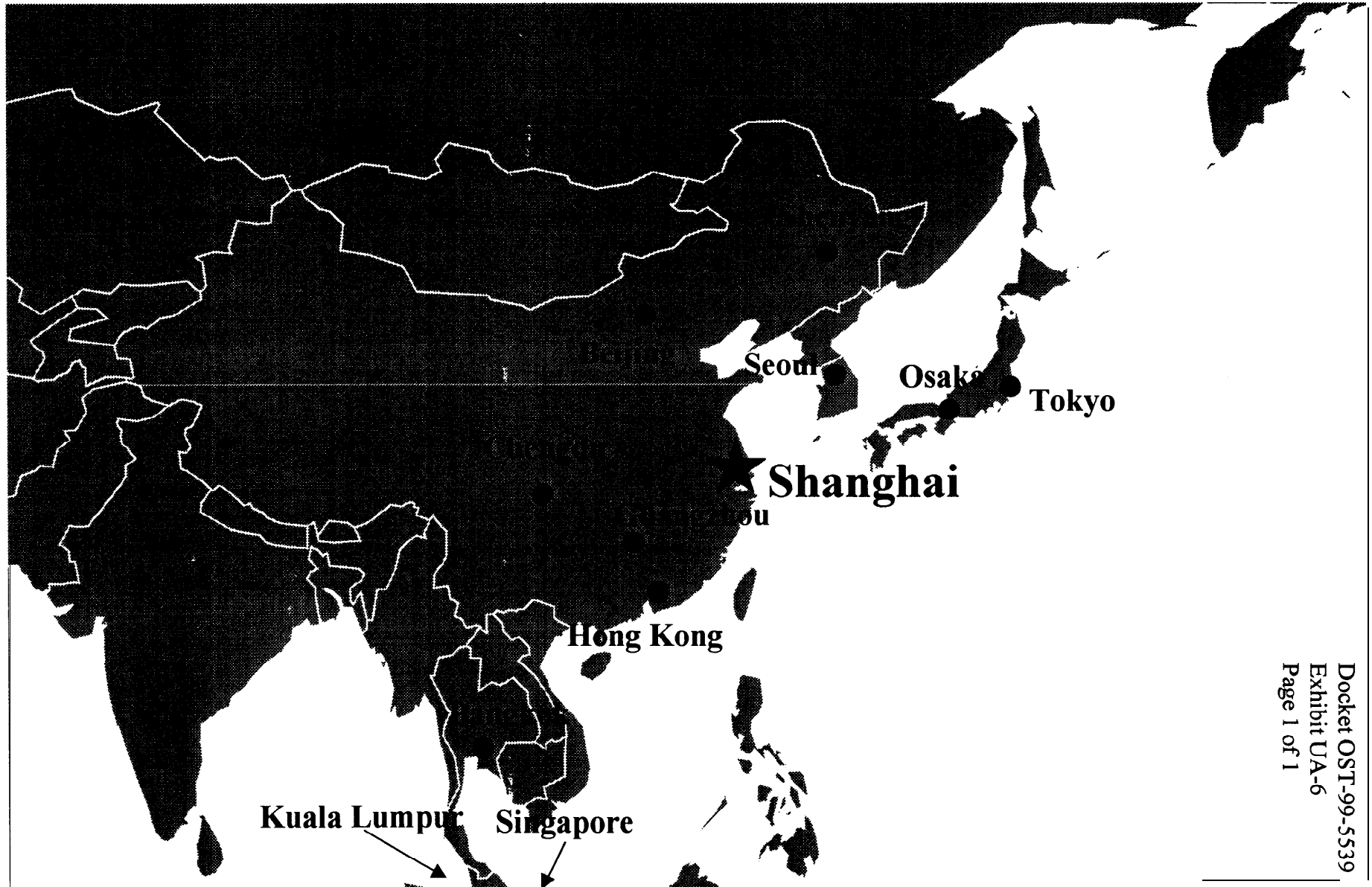
***California Is By Far The Largest  
U.S. Market for Service To/From Shanghai***

<u>Rank</u>	<u>City</u>	<u>Number of Passengers Per Day Each Way</u>
1	LAX	140.4
2	SFO	92.1
3	NYC	80.0
4	CHI	18.2
5	HNL	12.5
6	BOS	12.0
7	EWR	9.1
8	WAS	9.0
9	DTW	8.9
10	IAH	8.9
11	SEA	7.5
12	DFW	7.5
13	PHL	5.0
14	ATL	4.8
15	MSP	3.7
16	DEN	3.2
17	MA	3.1
18	CLE	2.9
19	PDX	2.6
20	PIT	2.3
21	BWI	2.2
22	SAN	2.1
23	MCO	2.1
24	STL	2.1
25	PHX	1.9

Source: CRS Booking Data, Full Year 1998

# ***Shanghai Is A Centrally-Located Gateway To Asia***

*(Cities Indicated are Served via Shanghai)*





***United's Nonstop Service Will Improve  
Travel Times Between U.S. Cities and Shanghai***

<b>Best UA Elapsed Journey Time TO Shanghai</b>			
<b>City</b>	<b>Current Best</b>	<b>With SFOSHA Nonstop</b>	<b>Savings (HH:MM)</b>
MIA	23: 50	20:15	3:35
DFW	21:00	17:55	3:05
MCO	23:20	20:15	3:05
ATL	22: 00	19:25	2:35
IAH	21:00	18:25	2:35
WAS	22: 30	19:55	2:35
BWI	22: 30	20:10	2:20
PHX	19:00	16:45	2:15
SFO	14:55	13:00	1:55
EWR	22: 00	20:25	1:35
DEN	18:39	17:10	1:29
STL	21:41	20:15	1:26
SAN	17:45	16:20	1:25
PIT	21:40	20:25	1:15
BOS	21:30	20:25	1:05
DTW	21:20	20:25	0:55
PDX	16:45	15:55	0:50
CLE	21:35	20:45	0:50
LAX	16:00	15:15	0:45
PHL	20:45	20:25	0:20
MSP	20:15	20: 05	0:10

<b>Best UA Elapsed Journey Time FROM Shanghai</b>			
<b>City</b>	<b>Current Best</b>	<b>With SHASFO Nonstop</b>	<b>Savings (HH:MM)</b>
BWI	21:28	18:33	2:55
SFO	14:10	11:25	2:45
WAS	20:40	18:10	2:30
SAN	17:36	15:21	2:15
BOS	21:40	19:25	2:15
DEN	18:17	16:02	2:15
DFW	19:06	16:51	2:15
EWR	21:05	18:50	2:15
IAH	19:43	17:28	2:15
MSP	20:46	18:31	2:15
STL	22:19	20: 04	2:15
PHX	17:33	15:19	2:14
ATL	20:20	18:06	2:14
PHL	20:18	18:39	1:39
MIA	23:27	21:50	1:37
CLE	21:06	19:43	1:23
DTW	20: 55	19:32	1:23
CHI	17:50	17:13	0:37
LAX	15:20	14:48	0:32
PDX	15:30	15:22	0:08

UNITED FIRST SUITE CONFIGURATION

**B747-400 OB**  
**14UF / 84UB / 270UE = 368**

**FLEET DATA**  
**AS CODE NOSE NUMBER**

**OB 80XX**

**ZONE A - FIRST**  
**14 SUITES**

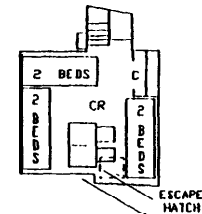
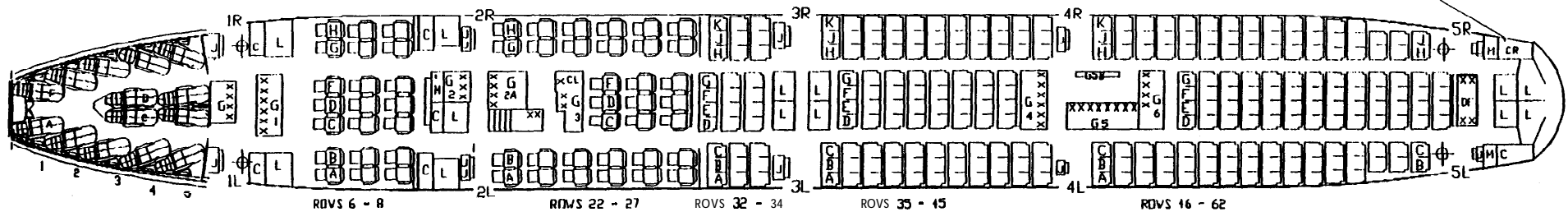
**ZONE B - BUSINESS**  
**21 SEATS**

**ZONE C-BUSINESS**  
**33 SEATS**

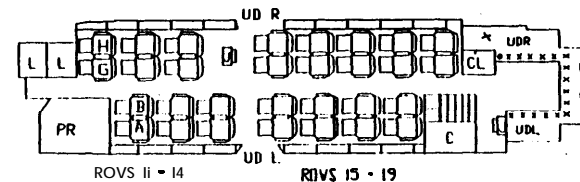
**ZONE C - ECONOMY**  
**30 SEATS**

**ZONE D - ECONOMY**  
**88 SEATS**

**ZONE E - ECONOMY**  
**142 SEATS**



**UPPER DECK - BUSINESS**  
**30 SEATS**



**LEGEND**

**G** GALLEY  
**J** FLIGHT ATTENDANT JUMPSEAT  
**L** LAVATORY  
**C** CLOSET  
**V** VIDEO MONITOR/LCD/SCREEN  
**M** MISCELLANEOUS STOWAGE

**W** WINDOW EXIT  
**X** PERMANENT TIEDOWN  
**⊕** RETRACTABLE TIEDOWN  
**CR** CREW REST  
**DF** DUTY FREE  
**CL** CART LIFT

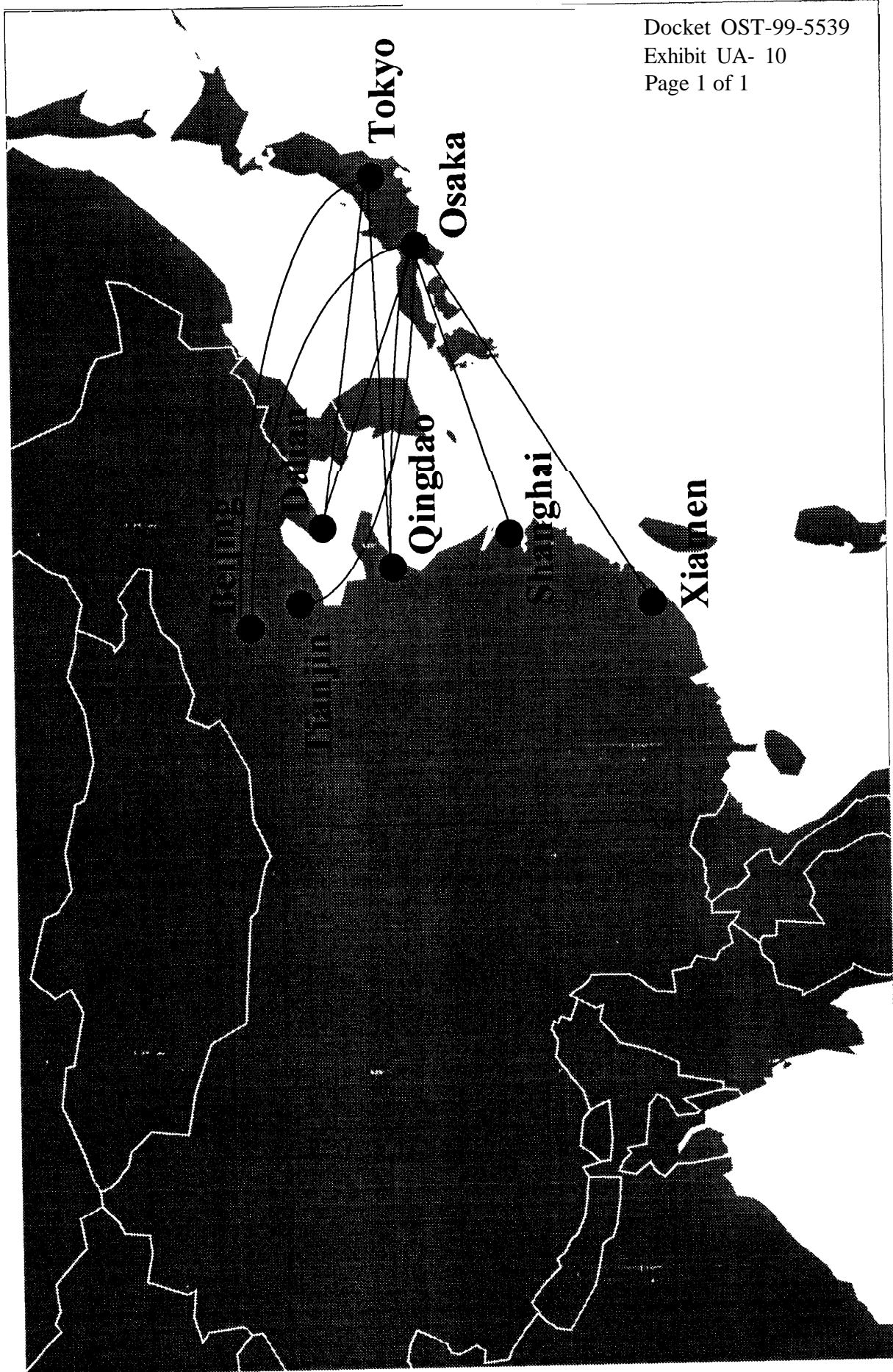
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***North west Is Currently Offering  
17 Weekly China-U.S. Roundtrips***

Beijing-Detroit	5 times per week (NW)
+ Beijing-Detroit (one-stop)	2 times per week (NW)
+ Shanghai-Detroit (one-stop)	2 times per week (NW)
+ Beijing-Shanghai-San Francisco	4 times per week (NW*)
+ Beijing-Shanghai-Los Angeles	<u>4 times per week (NW*)</u>
<b>TOTAL</b>	<b>17 times per week</b>

Note: Service includes code-share with Air China (NW\*)

*ANA Serves 9 China City Pairs  
From United's Gateways In Japan*



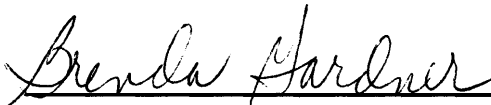
Docket OST-99-5539

Exhibit UA- 10

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CERTIFICATE OF SERVICE

I hereby **certify** that I have this date served a copy of the foregoing Application of United Air Lines, Inc. on all persons named on the attached Service List by causing a copy to be sent via **facsimile** and first-class mail, postage prepaid.

  
Brenda Gardner

**DATED:**      **April 21, 1999**

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